

FILED

November 17, 2021

UNITED STATES DISTRICT COURT
 WESTERN DISTRICT OF TEXAS
 DEL RIO DIVISION

CLERK, U.S. DISTRICT COURT
 WESTERN DISTRICT OF TEXAS
 By: SAJ Deputy

UNITED STATES OF AMERICA	§	CAUSE NO.: DR-21-CR-01915-AM
	§	
	§	<u>INDICTMENT</u>
v.	§	
	§	[VIO: COUNT ONE: 8 U.S.C. § §
	§	1324(a)(1)(A)(v)(I) & (B)(iii),
DAVID BAUTISTA	§	Conspiracy to Transport Illegal Aliens
	§	resulting in Serious Bodily Injury or
	§	Placing Lives in Jeopardy; COUNT
	§	TWO: 8 U.S.C. § 1324(a)(1)(A)(ii) &
	§	(B)(iii), Illegal Alien Transportation
	§	Resulting in Serious Bodily Injury or
	§	Placing Lives in Jeopardy.]
	§	

THE GRAND JURY CHARGES:

COUNT ONE

[8 U.S.C. § 1324(a)(1)(A)(v)(I) & (B)(iii)]

On or about October 27, 2021, in the Western District of Texas, Defendant,

DAVID BAUTISTA,

together, and with others known and unknown, did knowingly and intentionally, conspire, combine, and confederate to commit the following acts against the United States: transport and move and attempt to transport and move aliens within the United States by means of transportation and otherwise, while knowing and in reckless disregard of the fact that the aliens had come to, entered, and remained in the United States, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii), and in furtherance of such violation of law, and during and in relation to such transportation, Defendants' conduct caused serious bodily injury to and placed in jeopardy the life

of one or more persons, all in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I) and (B)(iii).

COUNT TWO

[8 U.S.C. § 1324(a)(1)(A)(ii) & (B)(iii)]

On or about October 27, 2021, in the Western District of Texas, Defendant,

DAVID BAUTISTA,

knowing and in reckless disregard of the fact that the hereinafter named aliens had come to, entered and remained in the United States in violation of law, transported and moved, and attempted to transport and move, in furtherance of such violation of law, certain aliens, to-wit: Cinthya Ludmilla, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii), and such offense caused serious bodily injury to and placed in jeopardy the life of one or more persons, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii) & (B)(iii).

A TRUE BILL

FOREPERSON

AHSLEY C. HOFF
United States Attorney

By: *James T. Ward FOR*
ZACHARY D. BIRD
Assistant United States Attorney